

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtor.¹

PROMESA Title III

Case No. 17 BK 3283-LTS

(Jointly Administered)

Re: ECF Nos. 10839

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO.

Debtor.

PROMESA Title III

Case No. 17 BK 3566-LTS

(Jointly Administered)

Re: ECF Nos. 810

**This Motion relates only
to the Commonwealth and ERS,
and shall be filed in
Case No. 17 BK 3283-LTS and
Case No. 17 BK 3566-LTS**

**MOTION OF THE COMMONWEALTH OF PUERTO RICO AND THE EMPLOYEES
RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO FOR ENTRY OF AN ORDER (A) EXTENDING THE RETURN DATE
FOR FILING INFORMATION FORMS AND (B) APPROVING FORM AND MANNER OF
NOTICE THEREOF**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),¹ respectfully submit this motion (the “Motion”), pursuant to sections 105(a), 501, 502, and 1125 of title 11 of the United States Code (the “Bankruptcy Code”), made applicable to this case pursuant to PROMESA Section 301(a), and Rules 2002(a)(7), 2002(f), 2002(l), 2002(m), 3001, 3002(a), 3003(c), and 3017 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), made applicable to this case pursuant to PROMESA Section 310, for entry of an order, substantially in the form annexed hereto as **Exhibit A** (the “Proposed Order”), (a) extending the Return Date for filing Information Forms (each as defined below) and (b) approving form and manner of notice thereof; and in support of this Motion, the Debtors respectfully state as follows:

JURISDICTION

1. The United States District Court for the District of Puerto Rico (the “Court”) has subject matter jurisdiction over this matter pursuant to PROMESA Section 306(a).
2. Venue is proper pursuant to PROMESA Section 307(a).

BACKGROUND

3. On March 18, 2020, the Court entered the *Order (A) Establishing Pre-Solicitation Procedures for Certain Holders of Retirement Benefit Claims, (B) Establishing Procedures and Deadlines for Submission of Information Necessary for Solicitation of Acceptance or Rejection of*

¹ PROMESA is codified at 48 U.S.C. §§ 2101–2241.

Plan of Adjustment, and (C) Approving Form and Manner of Notice Thereof [ECF No. 12438] (the “Pre-Solicitation Procedures Order”). The Pre-Solicitation Procedures Order set a deadline of 4:00 p.m. (Atlantic Standard Time) on May 21, 2020 (the “Return Date”) as the date by which Employee Claimants must submit to Prime Clerk the Information Form containing the Requested Information. The Pre-Solicitation Procedures Order further permitted Employee Claimants to file Information Form by hand delivery at collection centers to be established at various locations on the island of Puerto Rico, as well as in Brooklyn, NY (collectively, the “Collection Centers”).

4. On March 15, 2020, in response to the spread of COVID-19 in Puerto Rico, the Governor of Puerto Rico signed the *Executive Order of the Governor of Puerto Rico, Hon. Wanda Vázquez Garced, to Make Viable the Necessary Government and Private Closures to Fight the Effects of Coronavirus (COVID-19) and Control the Risk of Contagion on Our Island*, Administrative Bulletin No. OE-2020-023 (the “First Executive Order”). The First Executive Order ordered the “closure of all businesses in Puerto Rico as of today, March 15 at 6:00 p.m. until March 30, 2020.” Furthermore, the Executive Order imposed a curfew from 9:00 p.m. through 5:00 a.m., during which time all residents of Puerto Rico must remain at home, and limited the purposes for which citizens may travel for essential services during non-curfew hours. In addition, all public schools have been closed since March 16, 2020, and the Government is operating on a partial shutdown as a result of the First Executive Order.

5. On March 30, 2020, the Governor signed Executive Order OE-2020-029 (the “Second Executive Order”), which amended the First Executive Order by imposing a stricter shelter-in-place order through April 12, 2020. The curfew was extended to require all Puerto Rico residents to remain in their homes between 7 p.m. and 5 a.m., and further clarified that residents may only leave their homes under certain limited circumstances.

6. On April 12, 2020, the Governor issued Executive Order OE-2020-033 (as subsequently amended by Executive Order OE-2020-034 on April 14, 2020, the “Third Executive Order,” and together with the First Executive Order and the Second Executive Order, the “Executive Orders”), which further extended, with some modifications, the existing measures to May 3, 2020.

7. As a result of the Executive Orders, and the curfews and mandatory closures of non-essential businesses they impose, the Collection Centers located in Puerto Rico will not open prior to May 4, 2020. Notwithstanding this delay in the opening of the Collection Centers located in Puerto Rico, Employee Claimants have been able to submit Information Forms online or through the mail in accordance with the procedures set forth in the Bar Date Order.

RELIEF REQUESTED

8. In light of the fact that the Collection Centers will not open until May 4, 2020, the Debtors submit that a brief extension of the Return Date, to and including **June 26, 2020** (the “Extended Return Date”), is appropriate. Accordingly, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting a brief extension of the Return Date and approving the Debtors’ proposed form of notice thereof.

9. In consenting to this extension, the Debtors do not waive any arguments, rights, or defenses with respect to any Information Forms filed after the Extended Return Date.

NOTICE OF ENTRY OF ORDER, EXTENDED RETURN DATE, AND RELATED PROCEDURES

10. The Pre-Solicitation Procedures Order required the Debtors to provide notice of the Return Date by causing a copy of a publication notice to be published in *Caribbean Business*. However, the Debtors understand that, due to restrictions imposed by the Executive Orders, *Caribbean Business* has suspended publication. Further, the Debtors understand that *Caribbean Business* does not know when it will be able to resume publication, but does not expect to resume

publication until late May, at the earliest. Therefore, in lieu of publication in *Caribbean Business*, the Debtors propose to provide publication notice of the Extended Return Date in the *San Juan Star*. The *San Juan Star* is a general interest paper, published daily in English, with a circulation of approximately 50,000.

11. The Debtors propose to provide notice of the Extended Return Date by causing a copy of a publication notice, substantially in the form annexed to the Proposed Order as **Exhibit 1** (the “Extended Return Date Notice”), to be published on or before fifteen (15) days following the date the Court’s order granting the Motion is issued, or as soon as practicable thereafter, in (a) *El Nuevo Dia* in Spanish (primary circulation is in Puerto Rico), (b) *San Juan Star* in English (primary circulation is in Puerto Rico), (c) *El Diario* and *El Nuevo Herald*, both in Spanish (primary circulation is in New York and Miami, respectively), and (d) *The Bond Buyer*. The publication notice has been tailored to provide notice of the Return Date on an extensive basis throughout Puerto Rico and the United States. The Debtors believe the publication notice would provide any Employee Claimants unknown to the Debtor with adequate notice of the pre-solicitation procedures, as well as the Extended Return Date and the instructions for submitting Information Forms.

12. The Debtors propose to provide a reminder notice of the Extended Return Date by causing another publication notice, substantially in the form of the Reminder Notice attached to the Pre-Solicitation Procedures Order as **Exhibit 1-B**, to be published in the periodicals identified in paragraph 11 on a date that is no fewer than fourteen (14) days prior to the Extended Return Date.

13. The Debtors believe that the Extended Return Date Notice, as well as the procedures for completing and returning Information Forms set forth in the Pre-Solicitation Procedures Order, will provide ample time and opportunity for Employee Claimants to submit Information Forms, which will facilitate the Debtors’ solicitation of votes for and ultimately confirming the Plan.

14. The Debtors submit that the proposed procedures for serving and publishing the Extended Return Date Notice comply with the requirements of PROMESA, the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Local Bankruptcy Rules, to be made applicable in these Title III Cases pursuant to the *Eleventh Amended Case Management Procedures* [Case No. 17-bk-3283-LTS, ECF No. 11885-1].

NOTICE

15. The Debtors have provided notice of this Motion to: (a) the Office of the United States Trustee for the District of Puerto Rico; (b) the entities on the list of creditors holding the 20 largest unsecured claims against the Debtors (d) the Office of the United States Attorney for the District of Puerto Rico; (e) counsel to the Puerto Rico Fiscal Agency and Financial Advisory Authority; (f) the Puerto Rico Department of Justice; and (g) all parties filing a notice of appearance in this Title III Case. The Debtors submit that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and granting such other relief as is just and proper.

[Remainder of Page Intentionally Left Blank]

Dated: April 30, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

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Debtors*

Exhibit A

Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i>,</div> <div>Debtor.¹</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 3283-LTS</div> <div>(Jointly Administered)</div>
<div>In re:</div> <div>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</div> <div>as representative of</div> <div>THE EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO.</div> <div>Debtor.</div>	<div>PROMESA Title III</div> <div>Case No. 17 BK 3566-LTS</div> <div>(Jointly Administered)</div> <div>This Motion relates only to the Commonwealth and ERS, and shall be filed in Case No. 17 BK 3283-LTS and Case No. 17 BK 3566-LTS</div>

**ORDER GRANTING MOTION OF THE COMMONWEALTH OF PUERTO RICO AND THE
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO FOR ENTRY OF AN ORDER (A) EXTENDING THE
RETURN DATE FOR FILING OF INFORMATION FORMS AND (B) APPROVING FORM
AND MANNER OF NOTICE THEREOF**

Upon the *Motion of the Commonwealth of Puerto Rico and the Employees
Retirement System of the Government of the Commonwealth of Puerto Rico for Entry of an Order*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

(A) *Extending the Return Date* and (B) *Approving Form and Manner of Notice Thereof* [ECF No. ____], dated April 30, 2020 (the “Motion”),² of the Commonwealth of Puerto Rico (the “Commonwealth”) and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS,” and together with the Commonwealth, the “Debtors”) for entry of an order (this “Order”) extending the Return Date; and this Court having jurisdiction over this matter pursuant to PROMESA Section 306(a); and it appearing that venue in this district is proper pursuant to PROMESA Section 307(a); and the Court having found that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest; and the Court having found that, based upon the relief requested by the Motion, no other or further notice is required; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The deadline for Employee Claimants to submit the Information Form with the Requested Information to Prime Clerk, either electronically, by mail, or by hand delivery, as defined and set forth in the *Order (A) Establishing Pre-Solicitation Procedures for Certain Holders of Retirement Benefit Claims, (B) Establishing Procedures and Deadlines for Submission of Information Necessary for Solicitation of Acceptance or Rejection of Plan of Adjustment, and (C) Approving Form and Manner of Notice Thereof* [ECF No. **12438**] (the “Pre-Solicitation Procedures Order”), shall be extended to **4:00 p.m. (Atlantic Standard Time) on June 26, 2020** (the “Extended Return Date”).

² All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

3. In accordance with Bankruptcy Rule 2002, the Debtors, through Prime Clerk, are authorized and directed to cause a copy of a notice, substantially in the form attached hereto as **Attachment 1** (the “Extended Return Date Notice”), to be published once, on or before fifteen (15) days after the entry of this Order, or as soon as practicable thereafter under the circumstances, in (a) *El Nuevo Día* in Spanish (primary circulation is in Puerto Rico), (b) *San Juan Star* in English (primary circulation is in Puerto Rico), (c) *El Diario* and *El Nuevo Herald*, both in Spanish (primary circulation is in New York and Miami, respectively), and (d) *The Bond Buyer*.

4. The Debtors, through Prime Clerk, are further authorized and directed to cause a copy of a notice, substantially in the form of the Reminder Notice attached to the Pre-Solicitation Procedures Order as **Exhibit 1-B**, to be published in the periodicals identified in paragraph 3 on a date that is no fewer than fourteen (14) days prior to the Extended Return Date.

5. The Court retains exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation and enforcement of this Order.

Dated: May ___, 2020

Honorable Laura Taylor Swain
United States District Judge

Attachment 1

Extended Return Date Notice

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtor.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO.

Debtor.

PROMESA Title III

Case No. 17 BK 3566-LTS

(Jointly Administered)

**NOTICE OF EXTENDED DEADLINE FOR SUBMITTING INFORMATION FORMS
FOR RETIREMENT BENEFICIARIES OF THE COMMONWEALTH
OF PUERTO RICO AND THE EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

DEADLINE EXTENSION

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TO ALL PARTICIPANTS OF THE EMPLOYEES RETIREMENT SYSTEM FOR THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO (“ERS”), THE JUDICIARY RETIREMENT SYSTEM FOR THE COMMONWEALTH OF PUERTO RICO (“JRS”), AND THE PUERTO RICO TEACHER’S RETIREMENT SYSTEM (“TRS”), PLEASE TAKE NOTICE OF THE FOLLOWING:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”) has filed the *Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Case No. 17-bk-3283, ECF No. 11946] (as amended or modified from time to time and including all exhibits thereto, the “Plan”) and a related disclosure statement [Case No. 17-bk-3283, ECF No. 11947] (as amended or modified from time to time and including all exhibits thereto, the “Disclosure Statement”) pursuant to which the Commonwealth of Puerto Rico (the “Commonwealth”) (together with ERS, the “Debtors”) and the Puerto Rico Public Buildings Authority (“PBA”) seek to adjust their debts under Title III of the *Puerto Rico Oversight, Management, and Economic Stability Act*.²

The Oversight Board is soliciting certain information from certain holders of retirement benefits claims (“Employee Claimants”)³ for whom the Debtors have incomplete or outdated information.

You may be a current or former participant of ERS, JRS, or TRS, and you may be required to submit a form with information the Debtors are currently missing (the “Information Form”), including: (a) name; (b) mailing address; (c) email address; (d) date of birth; (e) gender; (f) social security number⁴; and (g) employment information (collectively, the “Requested Information”). The Debtors request that, if at all possible, you submit your Information Form electronically on the website hosted by the Debtors’ claims and solicitation agent, Prime Clerk LLC (the “Claims Agent”), at <https://cases.primeclerk.com/PRRetirementBenefit/EPOC-Index>.

The deadline to file an Information Form has been extended to June 26, 2020 at 4:00 p.m. (Atlantic Time).

If you have already filed an Information Form, no further action is required unless directed by court order, notice, or otherwise.

² PROMESA is codified at 48 U.S.C. §§ 2101–2241. The Class number containing the retirement benefits claims may be changed therein.

³ In the Plan filed at Case No. 17-bk-3283, ECF No. 8765, Class 25 constitutes the claims of Employee Claimants. The Class number(s) constituting the claims of Employee Claimants may change in any subsequently filed Plan.

⁴ The Debtors seek to obtain the last four digits of claimants’ social security numbers in order to match claimants with their employee records.

Key Points

- In a Title III case under PROMESA, certain retirement beneficiaries of the Commonwealth and ERS may be entitled to vote on any plan of adjustment filed by the Commonwealth and ERS. In order for the Debtors to reduce the number of solicitation packages returned undeliverable, and ensure the claim amounts for such beneficiaries are accurately calculated, the Debtors are requesting that certain claimants submit an Information Form containing the Requested Information. This document explains how to submit Information Forms.
- A plan of adjustment is a document that explains how the Debtors propose to pay the amounts it owes to its creditors. This plan is available for creditors to review at <https://cases.primeclerk.com/puertorico/>.
- **If you are required to submit an Information Form, you must do so by June 26, 2020 at 4:00 p.m., Atlantic Standard Time.**
- Information Forms may be submitted by (a) electronically submitting on the Claims Agent's website at <https://cases.primeclerk.com/PRRetirementBenefit/EPOC-Index>, or (b) mail or hand delivery to the following addresses⁵:
 - Puerto Rico Retirement Benefit Information Processing Center, c/o Prime Clerk, LLC, 850 Third Avenue, Suite 412, Brooklyn, NY 11232;
 - Citi Towers, 250 Ponce de León Ave., Suite 503, Hato Rey, San Juan, PR 00918;
 - 151 Calle de San Francisco, 2nd Floor, San Juan, PR 00901;
 - Bianca Convention Center, Carr 2 KM 143, Floor 1, Añasco, PR 00610;
 - Oceana HUB Center, 2 Calle Acerina, Caguas, PR 00725;
 - Joe's Blue, MCS Building, 880 Tito Castro Avenue, 1st Floor, Ponce, PR 00716-4732.
- **The Debtors request that, if at all possible, you submit your Information Form electronically on the Claims Agent's website.**
- PLEASE NOTE THAT, in light of the Governor's executive orders issued on March 15, 2020, March 30, 2020 and April 12, 2020, addressing the situation regarding COVID-19, the collection centers at which Employee Claimants may file Information Forms will not open prior to June 26, 2020. Please call (844) 822-9231 before proceeding to one of these

⁵ The Debtors reserve the right to amend the locations accepting Information Forms by hand delivery.

locations to confirm whether the location is open. Employee Claimants are encouraged to file Information Forms electronically or by mail until the opening of the collection centers.

After reading this notice, if you require additional information, you may contact the Claims Agent at (844) 822-9231 (toll free for U.S. and Puerto Rico) or (646) 486-7944 (for international callers), available 10:00 a.m. to 7:00 p.m. (Atlantic Standard Time) (Spanish available), or by email at puertoricoinfo@primeclerk.com. Please note that the people answering the phone number are not able to provide legal advice. If you have questions about your legal rights, including whether you need to file a claim, you should talk to an attorney.